

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

JEFFREY RAMSEY,)	
)	
Movant,)	Misc. No: _____
)	
v.)	
)	
UNITED STATES DEPARTMENT)	
OF LABOR)	
)	
Respondent.)	

SWORN STATEMENT OF JEFF RAMSEY IN SUPPORT OF MOTION TO QUASH

I, Jeffrey Ramsey, do hereby depose and say:

1. My name is Jeffrey Ramsey, and I am over twenty-one (21) years of age, have never been convicted of a felony, and am otherwise fully competent to make this affidavit and to testify in any court of law. The facts set forth herein are true and correct and based upon my personal knowledge.

2. I am a resident of the State of Texas.

3. I am the sole owner of a sole proprietorship named Benefits Consulting Group. I have a bank account in the name of "Jeff Ramsey d/b/a Benefits Consulting Group" at First Security Bank, N.A. (and successor, Cierra Bank) ("First Bank"). I have never conducted business under the name "Benefits Consulting Group, LLC" and never opened a bank account in that name.

4. I am presently a customer of First Bank, and I am the customer whose records are being requested by the Government.

5. The financial records sought by the United States Department of Labor, Employee Benefits Security Administration ("DOL") are not being sought via a legitimate law enforcement inquiry.



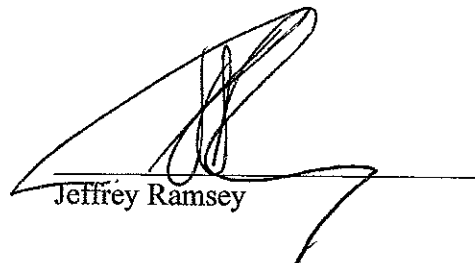
6. On April 19, 2013, I traveled to Washington D.C. at my own expense and voluntarily participated in an interview with Department of Labor ("DOL") Investigator Siamack Gharanfoli concerning The Chimes – Health and Welfare Benefit Plan ("the Plan"), of which I am a service provider. In that interview, I informed Investigator Gharanfoli that Benefits Consulting Group is a sole proprietorship.

7. At the end of November 2014, I discovered from a third party that the DOL issued a subpoena to First Bank for the financial records of my sole proprietorship Benefits Consulting Group. I never received notice of the issuance of this subpoena or the DOL's receipt of these records.

8. Upon information and belief, the DOL used the financial records of "Jeff Ramsey d/b/a Benefits Consulting Group" in their investigation of the Plan and to identify, call and harass my professional business associates and customers who have no relation to the Plan. This investigation has disrupted my business operations and my personal livelihood.

9. On November 6, 2014, Mr. Ramsey participated in a deposition conducted by the DOL. The DOL asked questions and used documents in that deposition that clearly derived from the financial records of "Jeff Ramsey d/b/a Benefits Consulting Group."

I affirm under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.


Jeffrey Ramsey

State of Texas


City of Dallas

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To-wit:

I, the undersigned, a Notary Public, hereby certify that on this 11th day of February, 2015, Jeffrey Ramsey, whose name is signed to the foregoing document, did personally appear before me and acknowledge that she executed this Affidavit.

Given under my hand (and notarial seal) this 11th day of February 2015.


Notary Public

My Commission Expires: _____

Commission No. _____

